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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

MARK WILSON

Plaintiffs,

v.

JERRY PLANTE, RONNIE FOSS, CRAIG
PRINS, JOSH HIGHBERGER, and
JOHN DOES 1-10.

Defendants.

Case No. 6:21-cv-01606-SI

STIPULATED MOTION FOR EXTENSION
OF TIME

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Juan C. Chavez, Counsel for Mark Wilson, hereby certifies that he has conferred with the Counsel for Defendants, Nathan Riemersma, regarding this motion, and they stipulate the relief requested in this motion.

RELIEF REQUESTED

Plaintiff requests an additional 60 days to complete discovery in this case, and to adjust other case deadlines accordingly.

STIPULATED MOTION FOR EXTENSION OF TIME

ARGUMENT AND AUTHORITY

Case schedules can be modified and extended based upon showings of “good cause.” Fed. R. Civ. P. 16(b)(4). The current close of fact discovery in this case is October 16, 2023. Here, there is good cause for an extension to December 15, 2023. Parties need to complete depositions and resolve discovery disputes. The parties have been in close contact over the intervening months resolving some of the discovery disputes in this case, but there are remaining issues. We anticipate that a 60-day extension will allow enough time to agree upon contested requests and produce responsive documents.

Per the Court’s February 16, 2023, Order, Dispositive Motions are currently due on November 16, 2023. We request a new deadline of January 15, 2024.

The current deadline to file a Joint ADR Report is due 30 days after the Court’s ruling on Dispositive Motions, or November 16, 2023, if no Dispositive Motions are filed. We request to change the Joint ADR Report deadline to January 15, 2024, if no Dispositive Motions are filed.

CONCLUSION

Based on the foregoing, Plaintiff requests that this unopposed motion be granted, and that the new close of discovery deadline be set.

DATED: October 11, 2023.

/s/ Juan C. Chavez
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Of Attorneys for Plaintiff

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